

**REMARKS**

Reconsideration of this application, in view of the foregoing amendment and the following remarks, is respectfully requested.

Claims 1-67 were originally presented for consideration in this application. Claims 1-15 were elected for prosecution in response to a requirement for restriction. Nonelected Claims 16-37 and 55-67 have been canceled above. Claims 68-83 have been added by the foregoing amendment to afford the applicants the breadth and scope of patent protection to which they are entitled. Accordingly, Claims 1-15, 38-54 and 68-83 are currently pending in this application.

The following rejections were set forth in the Office Action:

1. Claims 1 and 2 stand rejected under 35 USC §102(b) as being anticipated by U.S. Patent No. 5,964,296 to Ross;
2. Claims 3 and 8-13 stand rejected under 35 USC §103 as being unpatentable over Ross in view of U.S. Patent No. 6,148,915 to Mullen et al.;
3. Claims 14 and 15 stand rejected under 35 USC §103 as being unpatentable over Ross in view of Mullen et al. and U.S. Patent No. 6,269,883 to Gissler et al.; and
4. Claims 4-7 stand rejected under 35 USC §103 as being unpatentable over Ross in view of Mullen et al. and U.S. Patent No. 5,460,416 to Freidrich et al.

Turning now to the merits of the claims, the Ross patent is cited as anticipating Claims 1 and 2 under 35 USC §102(b). These claim rejections are respectfully traversed.

Specifically, the applicants would respectfully show that the elements and limitations recited in Claims 1 and 2 are not disclosed in the Ross patent.

The examiner applied the Ross patent to the application claims in paragraph 3 of the Office Action as follows:

With respect to claim 1, Ross discloses a well screen (26) comprising a sidewall including a material and at least one line (80) embedded in the sidewall material (column 6, lines 11-18).

Ross does describe a well screen 26. However, Ross does not describe the line 80 being embedded in a sidewall material of the screen 26. Instead, Ross describes the line 80 as being a hydraulic conduit connected to a sensor 78 of a flow control apparatus 40. The flow control apparatus 40 is installed in a service tool 10a.

The line 80 is not positioned in the well screen 26 at all. In addition, the line 80 is not positioned in a sidewall of the well screen 26. Furthermore, the line 80 is not embedded in a sidewall material of the well screen 26. Therefore, the Ross patent does not disclose all of the elements and limitations recited in Claim 1.

Claim 1 has been amended above to make it clear that the sidewall is an element of the well screen. Since Ross does not disclose all of the elements and limitations of Claim 1, the examiner is respectfully requested to withdraw the anticipation rejections of Claims 1 and 2, and the obviousness rejections of the claims dependent from Claim 1.

Claims 38-54 have been amended above so that they are now dependent from Claim 1. The examiner is respectfully requested to withdraw the requirement for restriction with regard to Claims 38-54. Since Claim 1 is allowable, the amended Claims 38-54 are also allowable.

New independent Claim 68 recites a well screen having a line extending therethrough, the well screen being expandable in a well. New independent Claim 77 recites a method wherein a well screen is expanded in a well while a line extends through the well screen. The art of record does not describe an expandable well screen which has a line extending therethrough, or a method of expanding a well screen in a well while a line extends through the well screen. Since these recited features are not described in the art of record, these claims and the claims dependent therefrom are allowable, as well.

In view of the foregoing amendment and remarks, all of the claims now pending in this application are now seen to be in a condition for allowance. A Notice of Allowance of Claims 1-15, 38-54 and 68-83 is therefore earnestly solicited.

**VERSION WITH MARKINGS TO SHOW CHANGES MADE**

Following is a marked-up version of each claim amended above.

1. (Amended) A well screen, comprising:  
a sidewall of the well screen including a material; and  
at least one line embedded in the sidewall material.

38. (Amended) [A well production system for a well having a wellbore, the system comprising:] The well screen according to Claim 1, wherein the well screen is interconnected in a coiled tubing string deployed into [the] a wellbore [, the coiled tubing string including at least one well screen, and the well screen including a line embedded in a sidewall material of the well screen].

39. (Amended) The [system] well screen according to Claim 38, wherein the sidewall material is a composite material.

40. (Amended) The [system] well screen according to Claim 38, further comprising a tractor device connected to the coiled tubing string, the tractor device conveying the coiled tubing string in the wellbore.

41. (Amended) The [system] well screen according to Claim 40, wherein the line supplies power to the tractor device.

42. (Amended) The [system] well screen according to Claim 38, further comprising a flow control device connected in the coiled tubing string, the flow control device being actuated via the line.

43. (Amended) The [system] well screen according to Claim 38, further comprising at least one sensor attached to the coiled tubing string, indications of a parameter sensed by the sensor being communicated via the line.

44. (Amended) The [system] well screen according to Claim 38, wherein the well screen is continuously formed on the coiled tubing string.

45. (Amended) The [system] well screen according to Claim 38, wherein the well screen is formed on the coiled tubing string by openings extending through a sidewall of the coiled tubing string.

46. (Amended) The [system] well screen according to Claim 45, wherein the coiled tubing string sidewall is made of a nonmetallic material.

47. (Amended) The [system] well screen according to Claim 45, wherein the coiled tubing string sidewall is made of a composite material.

48. (Amended) The [system] well screen according to Claim 38, wherein the well screen includes a filter media recessed into a tubular body of the well screen.

49. (Amended) The [system] well screen according to Claim 48, wherein an outer dimension of the filter media is less than or approximately equal to an outer diameter of a tubing portion of the coiled tubing string.

50. (Amended) The [system] well screen according to Claim 38, wherein the well screen is expandable in the wellbore.

51. (Amended) The [system] well screen according to Claim 38, further comprising at least one actuator attached to the coiled tubing string, the actuator being connected to the line.

52. (Amended) The [system] well screen according to Claim 38, wherein the coiled tubing string includes a flow control device actuated via the line.

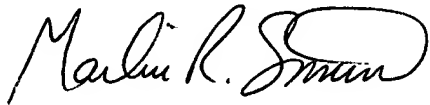
53. (Amended) The [system] well screen according to Claim 38, wherein the line is a selected one of a communication line, an injection line, a power line, a control line and a monitoring line.

54. (Amended) The [system] well screen according to Claim 38, wherein the line is a selected one of a hydraulic line, an electrical line and a fiber optic line.

The examiner is hereby requested to telephone the undersigned attorney of record at (972) 516-0030 if such would further or expedite the prosecution of the instant application.

Respectfully submitted,

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